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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

D.B. ZWIRN SPECIAL OPPORTUNITIES FUND,
L.P.,

Plaintiff,

- against -

SCC ACQUISITIONS, INC., and JOHN DOE 1 through
JOHN DOE 100,

Defendants.

EFC CASE

08 CV 5438(RJH)

**NOTICE OF MOTION FOR
AN ORDER OF REMAND
PURSUANT TO
28 U.S.C. § 1447**

PLEASE TAKE NOTICE, that upon the annexed Declaration of Daniel R. Milstein dated July 11, 2008, the annexed Declaration of Elise Hubsher dated July 10, 2008, and the accompanying Memorandum of Law, the Plaintiff D.B. Zwirn Special Opportunities Fund, L.P. ("Plaintiff") will move this Court before the Honorable Richard J. Holwell, United States District Judge for the Southern District of New York, at the United States Courthouse located at 500 Pearl Street, Courtroom 17B, New York, New York 10007, at a date and time to be scheduled by the Court, for an Order pursuant to 28 U.S.C. § 1447 remanding this action to the Supreme Court of the State of New York, New York County.

Dated: New York, New York
July 14, 2008

GREENBERG TRAURIG, LLP

By: 

Steven Sinatra (SS 7604)

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